

Exhibit J

In The Matter Of:

EBERT vs.

C.R. BARD

DR. RITCHIE

May 8, 2014

CLARK REPORTING & VIDEO CONFERENCING

2140 SHATTUCK AVE. STE. 405

Original File ritchie.txt

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1 you can trace back to where the fatigue crack initiated
2 with just by looking at the fracture surface. So
3 that's possibly why I removed that comment because it
4 wasn't globally true, but I can't actually recall
5 writing it in the first place.

6 BY MR. NORTH:

7 Q. Are you familiar with the manufacturing
8 process utilized by Bard to produce these filters?

9 A. Not in a detailed sense, but I know, you know,
10 roughly how they -- I mean, the things that pertained
11 to me would be to the state of the wire before it's --
12 when it's used. There are certain things like the
13 shape-setting procedures are important.

14 I reviewed those sometime ago for the earlier
15 cases. I haven't looked at that since for some time
16 now. So my memory may not be quite as accurate, but I
17 was mainly concerned about how these various
18 manufacturing procedures may lead to imperfections or
19 so forth that might lead to the fatigue. That's my
20 interest there.

21 Q. Well, you have not done a detailed assessment
22 of the manufacturing specifications for these products?

23 A. I looked at those. I mean, as it was -- I
24 don't -- I don't have a great recall of what exactly I
25 read, but there are certain things I didn't like. The

1 shape-setting procedure which leads to gouges on the
2 surface I thought was an unnecessary procedure that
3 that -- that if those gouges were going to be created
4 they ought to have been removed by some process like
5 electropolishing.

6 It's those issues. And the other issue I felt
7 was the fact that if you're going to use Nitinol wire
8 that it would have been better to use it as Bard
9 currently uses it, in an electropolished state.

10 Q. Are you familiar with what sort of inspections
11 are performed by Bard during the manufacturing process?

12 A. I can't recall them. I don't recall reading
13 very much. If they were inspected, they let through a
14 lot of devices with some pretty significant defects on
15 the surfaces.

16 Q. But you don't recall the details of any -- let
17 me finish.

18 A. Sorry. I beg your pardon.

19 Q. You don't recall the details of any inspection
20 procedures they may have utilized?

21 A. There's a document in there -- in I think
22 volume 2 or volume 1 that talks about looking at the
23 surface and seeing specific defect sizes. And I think
24 now I recall there's something about that they would
25 expect to see no blemishes, for want of a better word,